

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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|---------------|---|------------------------------------|
| GROUPON, INC. |) | |
| |) | |
| Plaintiff, |) | Case No. 1:21-cv-06082 |
| |) | |
| v. |) | Honorable Judge Charles P. Kocoras |
| |) | |
| SUNG SHIN, |) | |
| |) | |
| Defendant. |) | |

**DECLARATION OF JESSE WING IN SUPPORT OF DEFENDANT SUNG SHIN'S
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION PURSUANT TO
FED. R. CIV. P. 12(b)(2), OR IN THE ALTERNATIVE, MOTION TO TRANSFER VENUE
PURSUANT TO 28 U.S.C. § 1404**

I, Jesse Wing, declare the following:

1. I am one of the lawyers who represents Sung Shin in the above-captioned case. I am an attorney and Director with the law firm of MacDonald Hoague & Bayless, in Seattle, Washington, where I have been admitted to practice since 1998 and where I am in active practice.
2. In 1993, I was admitted to the Illinois Bar, ARDC #90784355, but am on Inactive Status, since I am practicing in the state of Washington. I was admitted to the Trial Bar of the United States District Court for the Northern District of Illinois on April 10, 1996. On November 15, 2021, my office contacted the clerk of this Court to re-activate my Trial Bar status and we are waiting to hear back.

3. According to the case docket, on Mr. Shin's last day of employment, on November 12, 2021, Plaintiff Groupon filed the following: (1) a 98-page Verified Complaint; (2) a 5-page Notice of Emergency Motion for Temporary Restraining Order; (3) a 44-page Memorandum of Points and Authorities in support thereof; and (4) a Motion for Leave to File Oversized Brief in Support of its Emergency Motion for Temporary Restraining Order. (Dkt. Nos. 1, 4, 5, 6). On Sunday, November 14, 2021, counsel for Plaintiff Groupon, Inc. served me with the Verified Complaint via electronic mail at about 3:30pm PST/5:30pm CT. A couple of hours later, at

approximately 6:32pm PST/8:32pm CT, counsel served the Emergency Temporary Restraining Order and accompanying documents also via electronic mail. Groupon did not email or alert me to the lawsuit until after I wrote to Groupon's counsel on Sunday afternoon to memorialize a conversation we had on Friday, November 12, 2021.

4. On Monday, November 15, 2021, Mr. Shin started his employment with Yelp.
5. Given the Court's Order granting the Temporary Restraining Order ("TRO"), Dkt. No. 11, on November 16, 2021, Mr. Shin is not going to work at Yelp until the TRO expires and/or is vacated.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. Dated this 17th day November, 2021, at Seattle, Washington.

/s/ Jesse Wing
Jesse Wing